

**LAW OFFICES OF DALE K. GALIPO**

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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA; ROBERT  
VACCARI; JAKE ADAMS; and DOES  
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**JOINT REPORT RE: SETTLEMENT  
PROCEEDINGS UNDER COURT-  
DIRECTED ADR PROGRAM**

1 **TO THE HONORABLE COURT:**

2 Pursuant to the Court’s Civil Trial Scheduling Order, Plaintiffs L.C., a minor  
3 by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his  
4 guardian *ad litem* Jasmine Hernandez; A.L., a minor by and through her guardian *ad*  
5 *litem* Lydia Lopez; and Antonia Salas Ubaldo (“Plaintiffs”) and Defendants State of  
6 California, by and through the California Highway Patrol, Michael Blackwood,  
7 Isaiah Kee, Bernardo Rubalcava (“State Defendants”), County of San Bernardino,  
8 Robert Vaccari, and Jake Adams (“County Defendants”) (collectively “the Parties”),  
9 hereby submit this Joint Report Regarding Settlement Proceedings Under Court-  
10 Directed ADR Program.

11 A mediation pursuant to ADR Procedure No. 2 was held on April 1, 2025,  
12 before ADR Panel Mediator Richard Copeland. The individual parties, their  
13 respective trial counsel, and/or representatives appeared as required by Local Rule  
14 16-15.5(b).

15 Plaintiffs and County Defendants reached a tentative settlement. This  
16 settlement is subject to County Board approval as well as Court approval of the minor  
17 Plaintiffs’ application of compromise of claims. This matter is set for review by the  
18 Board of Supervisors at the next available closed session meeting on April 29, 2025.

19 Plaintiffs and State Defendants were unable to reach a settlement. However,  
20 the Plaintiffs and State Defendants are open to reopening settlement discussions  
21 should circumstances change.

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1 Respectfully submitted,

2 DATED: April 8, 2025

LAW OFFICES OF DALE K. GALIPO

3  
4 Bv /s/ Hang D. Le

5 Dale K. Galipo  
6 Hang D. Le  
7 Attorneys for Plaintiffs

8  
9 DATED: April 8, 2025

10 ROB BONTA  
11 Attorney General of California  
12 CHRISTINE E. GARSKE  
13 Supervising Deputy Attorney General

14 /s/ *Diana Esquivel*

15 DIANA ESQUIVEL  
16 Deputy Attorney General  
17 Attorneys for Defendant State of Cal., by and  
18 through the CHP, Blackwood, Kee, and  
19 Rubalcava

20  
21 DATED: April 8, 2025

LYNBERG & WATKINS

22 Bv /s/ Shannon L. Gustafson

23 Shannon L. Gustafson  
24 Amy R. Margolies  
25 Attorneys for Defendants  
26 COUNTY OF SAN BERNARDINO,  
27 ROBERT VACCARI, and JAKE ADAMS

28  
\*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose  
behalf the filing is submitted, concur with the filing's content and have authorized  
the filing.